

UNITED STATES OF AMERICA  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AL QASSIMI ACADEMY,

Plaintiff,

No. 1:23-cv-289

v

Honorable Paul L. Malony

ISMAIL ABUHALTAM,

Defendants.

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**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE  
FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rule of Civil Procedure 56, Defendant, Ismail Abuhaltam, respectfully moves this Court for entry of an Order granting summary judgment in his favor. In the alternative, pursuant to Fed. R. Civ. P. 12 (c), Defendant moves for a judgment on the pleadings.

In support of this Motion, Defendant is filing a brief in support of this motion. . For the reasons stated in the supporting Memorandum, Defendant contends that there is no genuine disputed issue as to any material fact and that he is entitled to a judgment as a matter of law. Further, Defendant is entitled to a judgment based on the pleadings set forth in the complaint.

Pursuant to Local Rule 7.1(d), on June 19, 2024, the undersigned counsel contacted counsel for the Plaintiff to see concurrence in this motion, but concurrence was denied.

Defendant requests that the Court conduct oral argument in connection with this motion.

Dated: June 20, 2024

Respectfully submitted,

/s/Jeffrey A. Chip

Jeffrey A. Chip, P.C

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